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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHERMAINE CARROLL,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:17-cv-02237-MMD-PAL

**JOINT STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR
REVERSAL OR REMAND**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Reversal and/or Remand be extended for two business days from March 9, 2018 to **March 13, 2018**. This is Defendant's fourth request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant is out sick on the date of the current filing deadline. Counsel apologizes for the belated request but did not anticipate being out on sick leave. Defendant makes this request in good faith with no intention to unduly delay the

1 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified
2 accordingly.

3 Respectfully submitted,

5 Dated: March 9, 2018

6 /s/ *Cyrus Safa
7 (*as authorized by email on March 9, 2018)
8 CYRUS SAFA
9 Attorney for Plaintiff

10 Dated: March 9, 2018

11 DAYLE ELIESON
12 Acting United States Attorney
13 DEBORAH LEE STACHEL
14 Regional Chief Counsel, Region IX
15 Social Security Administration

16 By /s/ Tina L. Naicker
17 TINA L. NAICKER
18 Special Assistant U.S. Attorney
19 Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:

22 DATED: March 13, 2018

23 
24 THE HONORABLE PEGGY A. LEEN
25 UNITED STATES MAGISTRATE JUDGE
26

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO**
4 **RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL OR REMAND** on the date and via
5 the method of service identified below:

6 **CM/ECF:**

7
8 Cyrus Safa
9 Law Offices of Lawrence D. Rohlfing
10 12631 E. Imperial Highway, Suite C-115
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23
24 Attorneys for Plaintiff

25
26 Respectfully submitted this 9th day of March 2018,

27
28 /s/ Tina L. Naicker
29 TINA L. NAICKER
30 Special Assistant United States Attorney